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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC., and DALE BUCZKOWSKI,

Plaintiffs,

v.

SPENCER CORNELIA, CORNELIA MEDIA
LLC, and CORNELIA EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**STIPULATION TO EXTEND TIME AS
TO THE REPLY IN SUPPORT OF
DEFENDANTS' SPECIAL MOTION TO
DISMISS PURSUANT TO NRS 41.660
(ECF NO. 61)

(FIRST REQUEST)**

Plaintiffs Wealthy Inc. and Dale Buczkowski ("Plaintiffs") and Defendants Spencer Cornelia, Cornelia Media LLC, and Cornelia Education LLC ("Defendants") (collectively, the "Parties") hereby submit the following stipulation and order to extend the time for Defendants to file their Reply in support of their Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment (ECF No. 61) pursuant to LR IA 6-1.

1. Defendants filed their Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment on September 30, 2022. The document was filed twice in order

1 to comply with LR IC 2-2(b), and the motions were docketed as two separate docket entries, a
2 Motion to Dismiss (ECF No. 61), and a Motion for Summary Judgment (ECF No. 62).

3 2. On October 14, 2022, the parties filed a stipulation (ECF No. 65) for Plaintiffs'
4 response deadline to these motions to be moved to 21 days after September 30, as LR 7-2
5 establishes different response deadlines for motions to dismiss (14 days) and motions for
6 summary judgment (21 days). The Court granted this stipulation. (ECF No. 67).

7 3. On October 28, 2022, Plaintiffs filed their response to Defendants' Special Motion
8 to Dismiss and Motion for Summary Judgment (ECF Nos. 78 & 79).

9 4. LR 7-2 also provides different deadlines for replies in support of motions to
10 dismiss (7 days) and motions for summary judgment (14 days).

11 5. Because both motions have overlapping facts and argument, to avoid ambiguity
12 and to promote the just, speedy, and inexpensive determination of the pending motions as
13 docketed, the parties agree, subject to the Court's approval, that the deadline to file the reply in
14 support of the Motion to Dismiss (ECF No. 61) shall be extended to and including November 14,
15 2022, which is the same due date as the reply in support of the Motion for Summary Judgment
16 (ECF No. 62).

17 6. Additionally, to avoid ambiguity as to the page limit requirements under LR 7-3,
18 the parties agree, subject to the Court's approval, that the page limit of the omnibus reply in
19 support of the Motion to Dismiss (ECF No. 61) and Motion for Summary Judgment (ECF No.
20 62) shall be 20 pages,

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1 excluding exhibits, which is equivalent to the page limit requirements of a reply in support of a
2 motion for summary judgment.

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4 IT IS SO STIPULATED.

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6 Dated: November 1, 2022.

Respectfully Submitted,

7
8 /s/ Tamara Beatty Peterson

9 Tamara Beatty Peterson, NV Bar No. 5218
10 Nikki L. Baker, NV Bar No. 6562
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Las Vegas, NV 89101

/s/ Alex J. Shepard

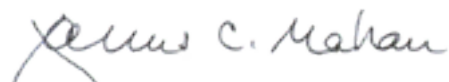
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15 Attorneys for Plaintiffs
16 Wealthy Inc. and Dale Buczkowski

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18 IT IS SO ORDERED.

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20 _____
U.S. DISTRICT COURT JUDGE

21 Dated: November 1, 2022
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